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January 17, 2023

Via Electronic Filing

Honorable John Michael Vazquez, U.S.D.J.
United States District Court, District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

SO ORDERED.

s/ John Michael Vazquez
John Michael Vazquez, U.S.D.J.

Date: 1/25/2023

Re: *Maxlite, Inc. v. ATG Electronics, Inc. et al.*
Case No.: 2:15-cv-01116-JMV-JBC

Dear Judge Vazquez:

This firm represents Defendant ATG in the above-captioned matter. Please accept this letter respectfully requesting a a thirty (30) day extension to file ATG's Letter seeking leave to file a Motion for Summary Judgement and its Rule 56.1 Statement, pursuant to Your Honor's Order. *See, Dkt. 484.*

The reason for the extension request is Robert P. Manetta, Esq., who has been heavily involved in litigating this matter for approximately three (3) years is leaving the firm on January 20, 2023. It warrants reminding that this has been extensively litigated with over fifteen (15) depositions. In addition to my current case load, this matter will fall primarily on my shoulders. While we have been working diligently to complete the submission it will not be completed by January 30, 2023, the additional time will afford John Hegarty, Esq. of this office to become acquainted with this very fact specific case that has been litigated for over seven years.

We have contacted our adversary, MaxLite's counsel, Ms. Kory Ann Ferro, who has consented to the extension, but only for ten (10) days. Ms. Ferro also requests that any extension that may be granted by Your Honor also be granted for MaxLite.

Therefore, in good faith, we respectfully request Your Honor extend this deadline to file our submission until February 20, 2023. We apologize for any inconvenience and thank Your Honor for your attention to this matter. Should you have any questions I am available.

Respectfully submitted,

JASINSKI, P.C.

s/ David F. Jasinski
DAVID F. JASINSKI, ESQ.

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